

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TIFFANY SCORZO,)	
)	
Plaintiff,)	No. 1:23-cv-03836
)	
v.)	Judge Jeffrey I. Cummings
)	
UNUM LIFE INSURANCE COMPANY)	Magistrate Judge Sheila M. Finnegan
OF AMERICA,)	
)	
Defendant.)	

PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT

Now comes the plaintiff, TIFFANY SCORZO (“Plaintiff”), by her attorneys, MARK D. DEBOFSKY, MATTHEW T. MALONEY, and DEBOFSKY LAW, LTD., and hereby moves for the entry of judgment in her favor and against the defendant, UNUM LIFE INSURANCE COMPANY OF AMERICA (“Defendant”), pursuant to Fed. R. Civ. P. 52, on the ground that the preponderance of the evidence favors the entry of judgment in Plaintiff’s favor in this case for long-term disability benefits under § 502(a)(1)(B) of the Employee Retirement Income Security Act of 1974 (“ERISA”) (29 U.S.C. § 1132(a)(1)(B)). In support thereof, Plaintiff concurrently submits a separate Statement of Facts and Memorandum of Law.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against Defendant, order Defendant to pay her for all wrongfully denied long-term disability benefits, plus prejudgment interest, in an amount equal to the contractual amount of benefits to which she is entitled from February 13, 2023 to present, and award her attorneys’ fees and costs pursuant to ERISA §502(g) (29 U.S.C. § 1132(g)).

Dated: April 19, 2024

Respectfully Submitted,

/s/ Matthew T. Maloney

Matthew T. Maloney

One of Plaintiff's Attorneys

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The undersigned attorney hereby certifies that on April 19, 2024, he electronically filed the foregoing PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT with the Clerk of the Court using the CMF/ECF filing system, which sent notice of such filing to the above-named attorneys.

/s/ Matthew T. Maloney
Matthew T. Maloney
One of Plaintiff's Attorneys

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